

November 26, 2018

Director, Air & Toxics Technical Enforcement Program
Office of Enforcement, Compliance, and Environmental Justice
Mail Code 8ENF-AT
1595 Wynkoop Street
Denver, Colorado 80202-1129

RE: Annual Report (September 2, 2017 – September 1, 2018)
40 CFR 60, Subpart OOOO Affected Facility
40 CFR 60, Subpart OOOOa Affected Facility
50 Buttes Plant (P0024792)
Thunder Creek Gas Services, LLC

Dear Director:

LT Environmental, Inc. is submitting the annual 40 Code of Federal Regulations (CFR) Part 60, Subpart OOOO and OOOOa reports for the 50 Buttes Plant, on behalf of Thunder Creek Gas Services, LLC (TCGS). The enclosed annual report for Subpart OOOO includes pertinent requirements under Subpart OOOO and OOOOa for affected facilities.

Please do not hesitate to contact me at (303) 962-5537 or gfast@ltenv.com, or Hayden Truscott at htruscott@meritagemidstream.com if you have any questions or require additional information.

Sincerely,

LT ENVIRONMENTAL, INC.

(b) (6)

Ginger Fast
Project Air Quality Scientist

cc: Mr. Lars Lone — WDEQ Compliance Program Manager (IMPACT submission)
Mr. Tanner Shatto — WDEQ District 3 Engineer (IMPACT submission)
Mr. Hayden Truscott — TCGS Denver (electronic file)
Ms. Ashley Campsie — Evergreen Environmental Engineering (electronic file)



LT Environmental, Inc.
Advancing Opportunity

40 CFR 60 SUBPART OOOO ANNUAL REPORT

**50 BUTTES PLANT
CAMPBELL COUNTY, WYOMING**

NOVEMBER 2018

Prepared for:

**THUNDER CREEK GAS SERVICES, LLC
1114 Energy Street
Gillette, Wyoming 82716**

Prepared by:

**LT ENVIRONMENTAL, INC.
4600 West 60th Avenue
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40 CFR 60, SUBPART OOOO ANNUAL REPORT

50 BUTTES PLANT
CAMPBELL COUNTY, WYOMING

Project Number: 051818004

Prepared by:

(b) (6)

Ginger Fast
LTE Project Scientist

November 26, 2018

Date

Reviewed by:

(b) (6)

Ashley Campsie, P.E.
Evergreen Environmental Engineering

November 26, 2018

Date



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1.0 INTRODUCTION

The 50 Buttes Plant is a natural gas processing plant owned and operated by Thunder Creek Gas Services, LLC (TCGS) that operates reciprocating compressors subject to 40 Code of Federal Regulations (CFR) Part 60, Subpart OOOO and Subpart OOOOa. The 50 Buttes Plant has four reciprocating compressors subject to the requirements of 40 CFR Part 60, Subpart OOOO, and one subject to Subpart OOOOa. The 50 Buttes Plant, located in Campbell County, Wyoming, operates under Wyoming Department of Environmental Quality (DEQ) permit P0024792. This report is being submitted as required by 40 CFR Section (§) 60.5420 (Subpart OOOO).

All five compressors were purchased after August 23, 2011. Four units at the 50 Buttes Plant are considered affected facilities under 40 CFR Part 60, Subpart OOOO, based on their 2013 manufacture date, and one unit is considered an affected facility under 40 CFR Part 60, Subpart OOOOa, based on its 2015 manufacture date.

Thunder Creek Gas Services, LLC is submitting this report as required under § 60.5420(c)(1-3) for reciprocating compressor affected facilities complying with the maintenance requirements of § 60.5385(a)(1&2). There are three units complying with the maintenance requirements of § 60.5385(a)(1&2) and two units that comply with the requirements of § 60.5385(a)(3), control of rod packing vents using a closed vent system and flare. As of January 2017, the Leak Detection and Repair (LDAR) program at the 50 Buttes Plant was modified to include the closed vent monitoring requirements of § 60.5416(a)(1&2).



2.0 REPORTING REQUIREMENTS (§ 60.5420)

2.1 GENERAL INFORMATION (§ 60.5420(b)(1))

2.1.1 Company Name and Address (§ 60.5420(b)(1)(i))

Thunder Creek Gas Services, LLC

1331 Seventeenth Street, Suite 1100

Denver, Colorado 80202

2.1.2 Facility Location (§ 60.5420(b)(1)(i))

Legal: Section 29, Township 45 North, Range 74 West

Coordinates: 43.852503 N, 105.777977 W

2.1.3 Reporting Period (§ 60.5420(b)(1)(iii))

September 2, 2017, through September 1, 2018

2.1.4 Affected Facilities (§ 60.5420(b)(1)(ii))

Table 1: Identification of Affected Facilities Included in Report

Affected Facility Location	Affected Facility Description	Serial Number	Affected Subpart	Unique ID
50 Buttes Plant	Reciprocating Compressor	F-45817	0000	Condensate VRU 1
50 Buttes Plant	Reciprocating Compressor	F-45818	0000	Condensate VRU 2
50 Buttes Plant	Reciprocating Compressor	F-52255	0000a	Condensate VRU 3
50 Buttes Plant	Reciprocating Compressor	F-44656	0000	Stabilizer Overhead Comp 1
50 Buttes Plant	Reciprocating Compressor	F-44778	0000	Stabilizer Overhead Comp 2



2.2 STANDARDS APPLICABLE TO EACH AFFECTED FACILITY (§ 60.5385)

Table 2: Standards Applicable to Each Compressor Unit

Unique ID	Compliance Method	Applicable Standard
Condensate VRU 1	Closed vent to flare	§ 60.5385(a)(3)
Condensate VRU 2	Closed vent to flare	§ 60.5385(a)(3)
Condensate VRU 3	Maintenance	§ 60.5385a(a)(2)
Stabilizer Overhead Comp 1	Maintenance	§ 60.5385(a)(1)
Stabilizer Overhead Comp 2	Maintenance	§ 60.5385(a)(1)

2.3 WELL SITE AFFECTED FACILITY (§ 60.5420(b)(2))

The location is not a well affected facility as described by § 60.5365(a).

2.4 CENTRIFUGAL COMPRESSOR AFFECTED FACILITY (§ 60.5420(b)(3))

The location does not have centrifugal compressor affected facilities as described by § 60.5365(b).

2.5 RECIPROCATING COMPRESSOR AFFECTED FACILITY (§ 60.5420(b)(4))

There are four reciprocating compressors that meet the criteria in § 60.5365(c) and one that meets the criteria of § 60.5365a(c). These are identified in Table 2.

2.5.1 Number of months since last rod packing replacement (§ 60.5420(b)(4)(i))

Table 3: Compressor Rod Packing Replacement and Startup Dates

Unique ID or Serial Number	Startup Date	Last Rod Packing Replacement	Months since Rod Packing Replacement	Anticipated Date of Rod Packing Replacement
Condensate VRU 1	9/15/2014	Not applicable	Routed to flare	Routed to flare
Condensate VRU 2	9/15/2014	Not applicable	Routed to flare	Routed to flare
Condensate VRU 3	3/01/2016	December 2017	11	December 2020
Stabilizer Overhead Comp 1	9/15/2014	December 2017	11	December 2020
Stabilizer Overhead Comp 2	9/15/2014	December 2017	11	December 2020

Compressors not routed to flare replaced rod packing in December of 2017.

2.5.2 Record of deviations (§ 60.5420(b)(4)(ii))

There were no instances when the compressors were not operated in compliance with the requirements of § 60.5385.



2.6 PNEUMATIC CONTROLLER AFFECTED FACILITY (§ 60.5420(b)(5))

The location does not have pneumatic controller affected facilities as described by § 60.5365(d).

2.7 STORAGE VESSEL AFFECTED FACILITY (§ 60.5420(b)(6))

The location does not have storage vessel affected facilities as described by § 60.5365(e).



3.0 CERTIFICATION OF COMPLIANCE

The responsible official must sign a certification of truth, accuracy, and completeness as required by Subpart 0000 § 60.5420(b)(1)(iv) and Subpart 0000a § 60.5420a(b)(1)(iv). I hereby certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate, and complete.

Signature:

(b) (6)

Date:

11/26/18

Name:

Brian Peters

Title:

Vice President – Engineering and Construction

Phone:

(720) 330-8269